

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware  
corporation; AMAZON.COM SERVICES LLC,  
a Delaware limited liability company,

Plaintiffs,

v.

KAMRYN RUSSELL, an Individual;  
Individuals and/or Entities Doing Business as  
Certain Amazon Selling Accounts Identified in  
SCHEDULES 1A and 1B; and DOES 1-10,

Defendants.

No. 2:23-cv-01375-RSL

**NOTICE OF RELATED CASES**

Pursuant to Local Civil Rule 3(g), Plaintiffs give notice of the following related case (the  
“Related Case”):

- *Amazon.com, Inc., and Amazon.com Services LLC, v. Ashley Hawat, Zhang Mengjie, Shenzhen Yuhan Electronic Commerce Co., Ltd., Individuals and Entities Doing Business as Certain Amazon Selling Accounts Identified in Schedules 1A and 1, and Does 1-10*, Case No. 2:23-cv-01374-RSM (W.D. Wash.), filed on September 6, 2023.

The case listed above is related to this action because (a) it concerns similar parties, transactions, and events (namely, it involves the same plaintiffs; asserts nearly identical causes of action; and the defendants in both cases promoted and/or sold counterfeit products of similar

1 luxury brands in the Amazon.com store in violation of the same Amazon policies and using  
2 similar schemes involving social media); and (b) it appears likely there will be an unduly  
3 burdensome duplication of judicial resources—as well as the potential for conflicting results—if  
4 the cases are conducted before different judges. *See* LCR 3(g)(4)(A)–(B). Because the first-filed  
5 Related Case has been assigned to the Honorable Ricardo S. Martinez, Plaintiffs respectfully  
6 request that the Court designate the cases as related and transfer this case to Judge Martinez.

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8 DATED this 14<sup>th</sup> day of September, 2023.

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